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TALKRADIO 1020

The Twin State's Most POWERFUL AM
FM 99.7 mhz New London
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Office Of the Secretary
Federal Communications Commission
445 Twelfth Street S.W.
Washington, D.C. 20554


5 April 1999

Subject: MM Docket No. 99-25 / Low Power FM

Dear Madame Secretary,

Please find an original and nine copies of comments on the above captioned matter.

Yours truly,



Robert L. Vinikoor
President
Koor Communications, Inc.

RLV:cw

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Koor Communication, Inc. P.O. Box 2295 New London, NH 03257
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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Creation of a Low
Power Radio Service

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MM Docket No. 99-25

RM-9208
RM-9242

Comments of
Koor Communications, Inc.
P.O. Box 2295
New London, N.H. 03257

1. Koor Communications is a small locally owned and operated broadcasting company since 1988. We presently operate a daytime only AM station and a class A- FM both located in rural New Hampshire. Koor is solely owned and operated by Sheila and Robert Vinikoor. We have struggled over the past 11 years to make this business work, with half our broadcast day being limited by daytime only regulations. It has been a challenge.

2. To not allow existing daytime only broadcasters FM translators and to prohibit all broadcasters from participation in this new Low Power proposal seems like it will be even a greater blow to the already fragile AM Band, and be adding insult to injury.

3. Further, allowing hundreds to thousands of new FM stations to operate in an already crowded band, especially when DAB (IBOC) is in its infancy, is very risky in light of interference and commercial viability resulting from the increased competition for the limited ad revenue in the market and crowded bands.

4. Low Power FM will not achieve what the FCC desires, greater diversity, it will only cause a weakening of existing broadcasting, cause increased interference and be an injustice to existing broadcasters by disfranchising them from possible participation.

5. To achieve the goal of more diversity, the use of internet radio, a format already in place can do this and won't have any of the detrimental effects described above. This new Low Power FM service will have a more devastating effect than the 80-90 drop-ins had in the 1980's, and will result in an administrative nightmare for the FCC.